

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:	Case No. 20-51066-MAR
HENRY FORD VILLAGE, INC.,	Chapter 11
Debtor.	Honorable Mark A. Randon

**DEBTORS OBJECTION AND JOINDER TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS' OBJECTION TO REQUEST
FOR PAYMENT OF ADMINISTRATIVE CLAIM OF LIFE CARE
SERVICES LLC [DOCKET NO. 684]**

Henry Ford Village, Inc. debtor and debtor-in-possession (the “Debtor” or “Henry Ford Village”), through its undersigned counsel, hereby objects to the *Request for Payment of Administrative Claim of Life Care Services LLC* (the “LCS Request”) [Docket No. 684], and joins in the objection of the official committee of unsecured creditors (the “Committee) to the LCS Request (the “Committee Objection”) [Docket 695] and states as follows:

1. On March 6, 2021 this Court entered an Order (i) Approving Disclosure Statement on a Final Basis and (ii) Confirming Chapter 11 Liquidating Plan of Henry Ford Village, Inc. [Docket 0663] (the “Confirmation Order”). Pursuant to the

Chapter 11 Liquidating Plan of Henry Ford Village, Inc. (the “Plan”)¹ the Liquidating Trust will go into effect on the Effective Date which is expected to occur in the very near future. The duties or rights of the Liquidating Trust include conducting the claims analysis, objections to claims and the pursuit of Debtor causes of action. Pursuant to the Plan, the Liquidating Trust Oversight Committee shall initially be comprised of former members of the Committee that volunteer to participate as Liquidating Trust Oversight Committee members. Consequently, it is important that the Committee take the lead in determining and pursuing a response to the LCS Request. As such, Debtor supports, adopts and joins in the Committee Objection.

2. The Debtor does, however, also note for the Court that in the LCS Request, LCS makes mention of the Order Resolving the Motion by Life Care Services LLC on March 24, 2021 (Docket Number 348) (the “LCS Order”) and states that “Pursuant to the terms of the Order, Life Care Services continued to provide services to the Debtor and was to be paid its post-petition administrative expense claims on a current basis with a 15% holdback.” In response, the Debtor states that to its knowledge it has paid the full management fee required thereunder including the 15% holdback referred to by LCS.

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed in the Plan.

3. The Debtor reserves all rights to amend or supplement this objection as appropriate.

Dated: January 11, 2022

By: /s/ Sheryl L. Toby

**Counsel for Debtor and Debtor In Possession
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of January 2022, a true and correct copy of the foregoing document was filed via the Court's CM/ECF electronic noticing system, which will provide notice of the filing to all parties registered to receive ECF notices in this matter.

Dated: January 11, 2022

By: /s/ Sheryl L. Toby
Counsel for Debtor and Debtor In Possession
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